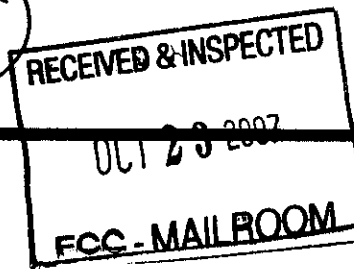


06-181

CGB-CC-0748



October 17, 2007

FCC Exemption Request
Commission's Secretary
Attention: CGB Room 3-B431
445 12th Street, SW
Washington, DC 20554

Dear Secretary:

Behind the Rack is an independently produced outdoor television show in the Boise Idaho viewing area. It is in its first year of operation and is currently airing on the local FOX 12 KTRV Network at 8:00am to 8:30am time slot as a paid commercial advertising. BTR consists mainly of big game hunting throughout the West and is designed to appeal to the avid outdoorsman.

Behind the Rack has purchased a contract from the FOX affiliate at a rate of \$500.00 per airing week and provides 13 original airings per calendar year. Closed Captioning for this program has been quoted and will cost \$225.00 per original episode with an additional \$100.00 to transcribe each original episode. Re-run episodes (39 total re-run weeks) are at a cost of \$100.00 per episode due to changing advertising spots. BTR has sold many advertising spots to help cover the costs of the network but the additional CC spots have not been sold. At a total of \$8125.00 for CC and in a small local market, BTR is soliciting advertisers to cover this cost. Current asking price is \$2200.00 per advertiser per year.

Because BTR is a start up company and is in its first year of production they are struggling to make the show profitable, but with the costs of new production and editing equipment along with the costs of production the first few years will be difficult to break even. With advertising sales going well so far and the growing popularity of the show, BTR fully plans to be operating in the positive by its 3rd year and is currently seeking more and better ways to fund the costs associated with an independent productions company, including Closed Captioning for the viewers with hearing impairments.

In summary Behind The Rack is asking for an exemption from Closed Captioning on the basis of undue burden only for the space of 3 to 5 years until they can either sell enough advertising to cover the costs or to purchase the necessary equipment to do the CC in house. BTR understands the importance of Closed Captioning requirements for all programs, including their own, and will endeavor to comply as soon as possible. Because of it being a new company BTR also has no existing tax records but does keep accurate records via Quickbooks.

Thank you for your consideration for this exemption.
Sincerely,

Tim Burnett
Producer/Editor/Host of Behind The Rack

830 W. White Sands Drive - Meridian, ID 83646
phone 208.288-1332 fax 208.288.1332 email info@behindtherack.com
www.behindtherack.com



October 17, 2007

GENERAL AFFIDAVIT

State of Idaho
County of Ada

BEFORE ME, (the undersigned Notary), on this day October 17th 2007
personally appeared Timothy Burnett, known to me to be a credible person and of lawful age,
who being by me first duly sworn, on his oath, deposes and says:

The information included in the attached letter dated October 17th, 2007 to the FCC Secretary,
is true and accurate to the best of his knowledge.

Timothy Burnett
Behind The Rack
830 W. White Sands Drive
Meridian, ID 83646

Subscribed and sworn before me on this day October 17th 2007

Christine Marcoc
(notary signature)

CHRISTINE MARCOE
(notary printed name)

CHRISTINE MARCOE
NOTARY PUBLIC
STATE OF IDAHO

MY COMMISSION EXPIRES

ON 09-08-2009